

Minds over matters.

AMY E. DAVIS direct dial - 214.749.6548 direct fax - 214.749.6348 amy.davis@hsblaw.com

March 31, 2008

Via Federal Express
John P. Bostany
THE BOSTANY LAW FIRM
Trump Building
40 Wall Street, 61st Floor
New York, NY 10005

Re: Cap

Capelli / GMA Our File No. 356.41

Dear Mr. Bostany:

Enclosed please find Defendant ePartners Inc.'s Privilege Log. Please also find two (2) CDs containing bates labeled documents eP 1173 – 46480 as supplemental production per the court's recent ruling from the bench in the above-referenced case.

As always, please contact me should you have questions regarding this correspondence.

Very truly yours,

Amy E. Davis

AED:mab Enclosure THELEN REID BROWN RAYSMAN & STEINER LLP Peter Brown W. Shamiso Kristen-Faith Maswoswe 875 Third Avenue New York, New York 10022 (212) 603-2000

Attorneys for Defendant ePartners Incorporated

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK : ECF CASE GMA ACCESSORIES, INC., No. 07 CV 8414 (LAK) Plaintiff, DEFENDANT'S PRIVILEGE LOG - against -EPARTNERS, INC. Defendant. :

Plaintiff GMA Accessories, Inc., by and through its counsel of record, John P. Bostany, TO: The Bostany Law Firm, 40 Wall Street, 61st Floor, New York, NY 10008.

COME NOW, ePartners Incorporated ("ePartners") Defendant in the above-entitled matter, and serve this, its Privilege Log, in accordance with Federal Rule of Civil Procedure 26((b)(5)(A).

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
Ken Eldridge	June 24,	Brett	E-mail	Work Product;
_	2004	Christiansen,	correspondence	Attorney Client
		Bruce Steele,	regarding creation	Communication
		Matt Purser	of royalty	
			agreement.	

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
Bruce Steele	June 24,	Ken Eldridge,	E-mail	Work Product;
	2004	Brett	correspondence	Attorney Client
		Christiansen,	response	Communication
		Matt Purser,	regarding creation	
		Lora Rogers,	of royalty	
		Rob	agreement.	
		Eggemeyer,		
		Fred Shepard		AND
Ken Eldridge	June 24,	Bruce Steele,	E-mail	Work Product;
	2004	Brett	correspondence	Attorney Client
		Christiansen,	regarding creation	Communication
		Matt Purser,	of referral	
		Lora Rogers,	agreement.	
		Rob		
		Eggemeyer,		
		Fred Shepard		
Rob	June 24,	Ken Eldridge,	E-mail	Work Product;
Eggemeyer	2004	Bruce Steele,	correspondence	Attorney Client
		Brett	regarding creation	Communication
		Christiansen,	of referral	
		Matt Purser,	agreement.	
		Lora Rogers,		
D C. 1		Fred Shepard		XX7 1 D 1 4
Bruce Steele	June 24,	Ken Eldridge,	E-mail	Work Product
	2004	Dan Duffy	correspondence	
			regarding creation of referral	
i			· ·	
Erik Sevenants	Ai1 10	Ken Eldridge,	agreement. E-mail	Work Product
Erik Sevenants	April 12, 2005	Eric Forgo, Dan	correspondence	WOIK FIOURICE
	2003	Duffy	regarding creation	
		Dully	of referral	
			agreement.	
Dan Duffy	April 12,	Erik Sevenants,	E-mail	Work Product;
Duit Duity	2005	Ken Eldridge,	correspondence	Attorney Client
	2000	Eric Forgo,	regarding creation	Communication
		Brett	of referral	
		Christiansen	agreement.	

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
Erik Sevenants	April 12,	Ken Eldridge,	E-mail	Work Product;
	2005	Eric Forgo,	correspondence	Attorney Client
		Brett	regarding	Communication
		Christiansen	Referral	
			Agreement and	
			Partnership	
			Summary with	
			highlighted	
			changes.	
Brett	April 2005		Attorneys draft of	Work Product;
Christiansen			ePartners Referral	Attorney Client
			Agreement with	Communication
			GMA.	
Brett	April 2005		Attorneys	Work Product
Christiansen			draft/notes of	
			Spreadsheet of	
			Capelli	
			Partnership	
1,000			Summary.	
Brett	April 12,	Erik Sevenants,	E-mail	Work Product;
Christiansen	2005	Ken Eldridge,	correspondence	Attorney Client
		Eric Forgo	regarding	Communication
			modification to	
~ = -1.1.1			agreement.	
Ken Eldridge	April 12,	Dan Duffy, Erik	E-mail	Work Product;
	2005	Sevenants, Eric	correspondence	Attorney Client
		Forgo, Brett	regarding	Communication
		Christiansen	modification to	
			agreement.	
Brett	April 12,	Ken Eldridge,	E-mail	Work Product;
Christiansen	2005	Dan Duffy, Erik	correspondence	Attorney Client
		Sevenants, Eric	regarding	Communication
		Forgo	modification to	
Tuio Pone	A!! 10	Tails 0 /-	agreement.	Manla Dua Jarata
Eric Forgo	April 13,	Erik Sevenants,	E-mail	Work Product;
	2005	Ken Eldridge,	correspondence	Attorney Client
		Brett Christiansen	regarding modification of	Communication
		Christiansen		
Brett	April 14,	Ken Eldridge,	agreement. E-mail	Work Product;
Christiansen	April 14, 2005	Erik Sevenants,	e-man correspondence	Attorney Client
Cinistialistii	2003	Bruce Steele	transmitting draft	Communication
	}	בוווכם פופבום	of revised Joint	Communication
			Marketing	
			Agreement	
			Agreement	

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			proposed between	
			ePartners and	
			GMA	
			Accessories.	
Brett	April 14,		Draft Joint	Work Product;
Christiansen	2005		Marketing	Attorney Client
			Agreement	Communication
			between GMA Accessories and	
			ePartners.	
Erik Sevenants	April 14,	Brett	E-mail	Work Product;
THE Devenants	2005	Christiansen,	correspondence	Attorney Client
	2005	Ken Eldridge,	regarding	Communication
		Bruce Steele	modifications to	
			Joint Marketing	
			Agreement.	
Brett	April 14,	Erik Sevenants,	E-mail	Work Product;
Christiansen	2005	Ken Eldridge	correspondence	Attorney Client
			transmitting	Communication
			redlined version	
			of Joint	
			Marketing	
			Agreement by	
			Eric Sevenants.	Work Product
	April 14,		Second version Redlined Joint	Work Product
	2005		Marketing	
			Agreement	
			between GMA	
			Accessories and	
			ePartners.	
Ken Eldridge	April 14,	Brett	E-mail	Work Product;
S	2005	Christiansen,	correspondence	Attorney Client
		Erik Sevenants	regarding	Communication
:			modifications to	
			the Joint	
			Marketing	
			Agreement.	TTT I TO I
Brett	April 14,	Dan Duffy, Ken	E-mail	Work Product;
Christiansen	2005	Eldridge, Erik	correspondence	Attorney Client
		Sevenants	transmitting	Communication
			revised version of the proposed Joint	
ļ			Marketing	
			Agreement	
			7 2 2 1 00 111 O 111	

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
			between ePartners and GMA Accessories for modifications.	
Dan Duffy	April 17, 2005	Brett Christiansen, Ken Eldridge, Erik Sevenants	E-mail correspondence regarding revised Joint Marketing Agreement.	Work Product; Attorney Client Communication
Brett Christiansen	April 25, 2005	Ken Eldridge, Dan Duffy	E-mail correspondence transmitting modified Joint Marketing Agreement for additional revisions.	Work Product; Attorney Client Communication
Brett Christiansen	April 25, 2005		Fourth redlined version of Joint Marketing Agreement between GMA Accessories and ePartners.	Work Product; Attorney Client Communication
Brett Christiansen	April 25, 2005		Fourth draft version of Joint Marketing Agreement between GMA Accessories and ePartners.	Work Product; Attorney Client Communication
Ken Eldridge	April 26, 2005	Brett Christiansen, Dan Duffy, Eric Forgo, Erik Sevenants	E-mail correspondence regarding agreement and Service Order, and redlined Joint Marketing Agreement.	Work Product; Attorney Client Communication
Dan Duffy	April 26, 2005	Ken Eldridge, Brett Christiansen, Eric Forgo, Erik Sevenants	E-mail correspondence regarding comments to agreement.	Work Product; Attorney Client Communication

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
Erik Sevenants	May 3, 2005	Eric Forgo, Ken	E-mail	Work Product;
		Eldridge, Brett	correspondence	Attorney Client
		Christiansen	regarding	Communication
			agreement.	
Brett	May 3, 2005	Erik Sevenants,	E-mail	Work Product;
Christiansen		Eric Forgo, Ken	correspondence	Attorney Client
		Eldridge	response	Communication
			regarding	
			agreement.	
Erik Sevenants	May 3, 2005	Brett	E-mail	Work Product;
		Christiansen,	correspondence	Attorney Client
		Eric Forgo, Ken	regarding	Communication
T.F. T-1 1 + 1	\	Eldridge	agreement.	
Ken Eldridge	May 3, 2005	Erik Sevenants,	E-mail	Work Product;
		Brett	correspondence	Attorney Client
		Christiansen,	regarding	Communication
Brett	Max 2 2005	Eric Forgo	agreement. E-mail	Wauls Duadants
Christiansen	May 3, 2005	Ken Eldridge	correspondence	Work Product; Attorney Client
CITISTIANISCH			regarding term of	Communication
			agreement.	Communication
Eric Forgo	May 3, 2005	Ken Eldridge,	E-mail	Work Product;
2110 1 0150	1414, 5, 2005	Erik Sevenants,	correspondence	Attorney Client
		Brett	regarding pending	Communication
		Christiansen	open points to	
			agreement.	
Erik Sevenants	May 4, 2005	Eric Forgo, Ken	E-mail	Work Product;
		Eldridge, Brett	correspondence	Attorney Client
		Christiansen	regarding changes	Communication
			to various	
			sections of	
WAI			agreement.	
Brett	May 4, 2005	Erik Sevenants,	E-mail	Work Product;
Christiansen		Eric Forgo, Ken	correspondence	Attorney Client
		Eldridge	regarding	Communication
			modification to	
			partnership	
Drott	May 12	Votlar Carre	agreement.	Worls Dradesets
Brett Christiansen	May 12, 2005	Kathy Sweeney	E-mail	Work Product;
CHISHAIISEH	2003		correspondence regarding	Attorney Client Communication
			agreement.	Communication
Brett	May 12,	Kathy Sweeney,	E-mail	Work Product;
Christiansen	2005	Amy McKie	correspondence	Attorney Client
	2005	TAILLY IVIOLATO	regarding project	Communication
	1		rogarding project	Communication

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			development.	
Amy McKie	May 12,	Brett	E-mail	Work Product;
	2005	Christiansen,	correspondence	Attorney Client
		Kathy Sweeney	regarding project	Communication
			development.	
Brett	May 12,	Amy McKie,	E-mail	Irrelevant;
Christiansen	2005	Kathy Sweeney	correspondence	Work Product;
			regarding project	Attorney Client Communication
TZ JJ G	24 10	D 44	development.	
Kathy Sweeney	May 12, 2005	Brett Christiansen	E-mail	Work Product; Attorney Client
	2005	Christiansen	correspondence regarding Dell	Communication
			reseller	Communication
			agreement.	
Brett	May 12,	Kathy Sweeney	E-mail	Work Product;
Christiansen	2005	Truthy 5 wooney	correspondence	Attorney Client
			regarding Dell	Communication
			reseller	
			agreement.	
Bruce Steele	February 17,	Eric Forgo	E-mail	Work Product
	2006	_	correspondence	
			response	
			regarding Top	
			Gun program	
			qualification.	
Eric Forgo	February 17,	Bruce Steele	E-mail	Work Product
	2006		correspondence	
			regarding project	
D.'. D	N. 6110	Mario Hebert	development. E-mail	Work Product
Eric Forgo	March 10, 2006	Mario riederi	correspondence	WOIK FIOURICE
	2000		with summary of	
			comments	
			regarding Capelli	
			project.	
Bruce Steele	March 21,	Howard	E-mail	Work Product
	2006	Diamond,	correspondence	
		Mario Hebert,	regarding moving	
		Dave Dickey,	Capelli up the	
		Laurie	enablement scale.	
		Tomasovsky		
Eric Forgo	March 21,	Fred Shepard,	E-mail	Work Product
	2006	Kathy Sweeney	correspondence	
			regarding account	
			receivables as	

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
			part of investigation in anticipation of litigation.	·
Fred Shepard	March 21, 2006	Eric Forgo, Kathy Sweeney	E-mail correspondence regarding account receivables as part of investigation in anticipation.	Work Product
Eric Forgo	March 21, 2006	Mario Hebert	E-mail correspondence regarding Capelli revenue impact and status on efforts in Capelli project.	Work Product
Mario Hebert	March 22, 2006	Maria Urdinarrain	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	March 24, 2006	Laurie Tomasovsky	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Lauri Tomascovy	March 24, 2006	Mario Hebert	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	March 24, 2006	Laurie Tomasovsky	E-mail correspondence regarding status of project as part of investigation in	Work Product

DATE	RECIPIENTS	DESCRIPTION	Privilege
		anticipation of	
March 24, 2006	Howard Diamond, Dave Dickey, Bruce Steele, Laurie Tomasovsky, Eric Forgo	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
April 4, 2006	Brett Christiansen, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding Capelli project.	Work Product; Attorney Client Communication
April 4, 2006	Mario Hebert, Brett Christiansen, Laurie Tomasovsky	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product; Attorney Client Communication
April 4, 2006	Dave Dickey	E-mail correspondence regarding as part of internal investigation in anticipation of litigation.	Work Product
April 4, 2006	Mario Hebert, Laurie Tomasovsky, Brett Christiansen	E-mail correspondence regarding as part of internal investigation in anticipation of litigation.	Work Product; Attorney Client Communication;
April 4, 2006	Mario Hebert	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product Work Product;
	March 24, 2006 April 4, 2006 April 4, 2006 April 4, 2006	March 24, 2006 March 24, 2006 March 24, 2006 April 4, 2006 Mario Hebert, Laurie Tomasovsky, Brett Christiansen April 4, 2006 April 4, 2006	March 24, 2006 March 24, 2006 March 24, 2006 Diamond, Dave Dickey, Bruce Steele, Laurie Tomasovsky, Eric Forgo April 4, 2006 April 4, 20

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
		Vinicombe	correspondence regarding project status as part of internal investigation in anticipation.	
Mario Hebert	April 4, 2006	Dave Dickey	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Dave Dickey	April 4, 2006	Mario Hebert	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Brett Christiansen	April 4, 2006	Mario Hebert, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product; Attorney Client Communication
Brett Christiansen	April 4, 2006	Dave Dickey, Mario Hebert, Laurie Tomasovsky	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product; Attorney Client Communication
Dave Dickey	April 4, 2006	Mario Hebert, Laurie Tomasovsky	E-mail correspondence regarding project status as part of internal investigation in	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			anticipation of litigation.	
Mario Hebert	April 5, 2006	Brett Christiansen, Dave Dickey, Laurie Tomasovsky	E-mail correspondence with draft Project Requirements: Axapta Demonstration and Excel spreadsheet of Capelli Deliverables regarding project status as part of internal investigation in anticipation of litigation.	Work Product; Attorney Client Communication
Brett Christiansen	April 5, 2006	Mario Hebert, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product; Attorney Client Communication
Mario Hebert	April 5, 2006	Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Mario Hebert	April 19, 2006	Laurie Tomasovsky, Dave Dickey, Mark Richmond, Par Stromblad, Bruce Steele	E-mail correspondence regarding project status as part of internal investigation in anticipation of	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
		i landaridi madistra di manifestata mistra da	litigation.	
Bruce Steele	April 19, 2006	Mario Hebert, Laurie Tomasovsky, Dave Dickey, Mark Richmond, Par Stromblad, Jonathan Lee, Kim Gravel, Bob Vanderslice, Ken Eldridge	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Dave Dickey	May 15, 2006	George Altirs	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Laurie Tomasovsky	May 17, 2006	Dave Dickey	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	May 17, 2006	Jamie Miller, Fred Shepard	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Fred Shepard	May 17, 2006	Dave Dickey, Jamie Miller, Kathy Sweeney	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
Jamie Miller	May 17, 2006	Fred Shepard, Dave Dickey, Kathy Sweeney	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Dave Dickey	May 17, 2006	Jamie Miller, Fred Shepard, Kathy Sweeney	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Bruce Steele	May 17, 2006	Dave Dickey, Fred Shepard	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Dave Dickey	May 17, 2006	Bruce Steele, Fred Shepard	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Brett Christiansen	May 18, 2006	Dave Dickey	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product; Attorney Client Communication
Dave Dickey	May 18, 2006	Brett Christiansen	E-mail correspondence regarding project status as part of internal	Work Product; Attorney Client Communication

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			investigation in anticipation of	
			litigation.	
Dave Dickey	June 1, 2006	Laurie	E-mail	Work Product
		Tomasovsky	correspondence	
			regarding project	
			status as part of	
			internal	
ı			investigation in	
			anticipation of litigation.	
Kathy Sweeney	May 8, 2006	Mario Hebert	E-mail	Work Product
Runny b weemey	17127 0, 2000	IVIAIIO IICOCIT	correspondence	West Library
			regarding project	
			status as part of	
			internal	
			investigation in	
			anticipation of	
, m. , m.	1.6	36 ' 77 1 .	litigation.	TT7 1 70 1
Eric Forgo	March 10, 2006	Mario Hebert	E-mail	Work Product
	2006		correspondence with review of	
			project as part of	
			investigation in	
			anticipation of	
			litigation.	
Bruce Steele	March 21,	Howard	E-mail	Work Product
	2006	Diamond,	correspondence	
		Mario Hebert,	regarding	
		Dave Dickey,	enablement scale	
		Laurie Tomasovsky	for project as part of investigation in	
		TOMASOVSKY	anticipation of	
			litigation.	
Eric Forgo	March 21,	Fred Shepard,	E-mail	Work Product
_	2006	Kathy Sweeney	correspondence	
			regarding	
			outstanding	
			accounts	
			receivable as part of investigation in	
			anticipation of	
			litigation.	
Fred Shepard	March 21,	Eric Forgo,	E-mail	Work Product
	2006	Kathy Sweeney	correspondence	

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			regarding outstanding accounts receivable as part of investigation in anticipation of litigation.	
Eric Forgo	March 21, 2006	Mario Hebert	E-mail correspondence regarding outstanding accounts receivable as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	March 22, 2006	Maria Urdinarrain	E-mail correspondence regarding project summary and enablement scale as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	March 24, 2006	Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Lauri Tomasovsky	March 24, 2006	Mario Hebert	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	March 24, 2006	Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
			litigation.	
Mario Hebert	March 24, 2006	Howard Diamond, Dave Dickey, Bruce Steele, Laurie Tomasovsky, Eric Forgo	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Howard Diamond	March 24, 2005	Mario Hebert, Dave Dickey, Bruce Steele, Laurie Tomasovsky, Eric Forgo	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	April 4, 2006	Brett Christiansen, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Dave Dickey	April 4, 2006	Mario Hebert, Brett Christiansen, Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Mario Hebert	April 4, 2006	Dave Dickey	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	April 4, 2006	Mario Hebert, Laurie Tomasovsky, Brett Christiansen	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Dave Dickey	April 4, 2006	Mario Hebert	E-mail correspondence	Work Product

Author	DATE	RECIPIENTS	DESCRIPTION	Privilege
Mario Hebert	April 4, 2006	Mark Vinicombe	regarding project planning as part of investigation in anticipation of litigation. E-mail correspondence	Work Product; Attorney Client
			regarding project planning as part of investigation in anticipation of litigation.	Privilege
Mario Hebert	April 4, 2006	Dave Dickey	E-mail correspondence regarding project planning as part of investigation in anticipation.	Work Product
Dave Dickey	April 4, 2006	Mario Hebert	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Brett Christiansen	April 4, 2006	Mario Hebert, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Brett Christiansen	April 4, 2006	Dave Dickey, Mario Hebert, Laurie Tomasovsky	E-mail correspondence regarding Service Orders.	Work Product; Attorney Client Privilege
Dave Dickey	April 4, 2006	Mario Hebert, Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
Mario Hebert	April 5, 2006	Brett Christiansen, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project transitioning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Brett Christiansen	April 5, 2006	Mario Hebert, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Mario Hebert	April 5, 2006	Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	April 19, 2006	Laurie Tomasovsky, Dave Dickey, Mark Richmond, Par Stromblad, Bruce Steele	E-mail correspondence regarding project planning and deliverables as part of investigation in anticipation of litigation.	Work Product
Bruce Steele	April 19, 2006	Mario Hebert, Laurie Tomasovsky, Dave Dickey, Mark Richmond, Par Stromblad, Jonathan Lee, Kim Gravel, Bob Vanderslice, Ken Eldridge	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE -
Laurie Tomasovsky	May 17, 2006	Dave Dickey	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	May 17, 2006	Jamie Miller, Fred Shepard	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Fred Shepard	May 17, 2006	Dave Dickey, Jamie Miller, Kathy Sweeney	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Jamie Miller	May 17, 2006	Fred Shepard, Dave Dickey, Kathy Sweeney	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	May 17, 2006	Jamie Miller, Fred Shepard, Kathy Sweeney	E-mail correspondence regarding project planning as part of investigation in anticipation.	Work Product
Bruce Steele	May 17, 2006	Dave Dickey, Fred Shepard	E-mail correspondence regarding project planning as part of investigation in anticipation.	Work Product
Dave Dickey	May 17, 2006	Bruce Steele, Fred Shepard	E-mail correspondence regarding project	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			planning as part of investigation in anticipation of litigation.	
Brett Christiansen	May 18, 2006	Dave Dickey	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Dave Dickey	May 18, 2006	Brett Christiansen	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product; Attorney Client Privilege
Dave Dickey	June 1, 2006	Laurie Tomasovsky	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Kathy Sweeney	May 8, 2006	Mario Hebert	E-mail correspondence accounts receivables as part of internal investigation in anticipation of litigation.	Work Product
Mario Hebert	May 10, 2006	Kathy Sweeney	E-mail correspondence regarding accounts receivables as part of internal investigation in anticipation of litigation.	Work Product
Kathy Sweeney	June 7, 2006	Laurie Tomasovsky, Fred Shepard	E-mail correspondence regarding project	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			planning as part of investigation in anticipation of litigation.	
Laurie Tomasovsky	June 8, 2006	Kathy Sweeney, Fred Shepard, David Briggs	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Kathy Sweeney	June 8, 2006	Laurie Tomasovsky, Fred Shepard, David Briggs	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	June 9, 2006	Howard Diamond	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Howard Diamond	June 9, 2006	Mario Hebert	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	June 9, 2006	Howard Diamond	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Howard Diamond	June 9, 2006	Mario Hebert	E-mail correspondence regarding project planning as part of investigation in anticipation of	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
			litigation.	
Fred Shepard	June 12, 2006	Dave Dickey, Kathy Sweeney, Jamie Miller	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	June 12, 2006	Fred Shepard, Kathy Sweeney, Jamie Miller	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Kathy Sweeney	June 12, 2006	Dave Dickey, Fred Shepard, Jamie Miller	E-mail correspondence sending spreadsheet attachment with summary of Sales by Customer- Software and Service-All.	Work Product
ePartners employee	June 12, 2006	Various ePartners employees	Spreadsheet analysis of accounts receivable information for project.	Work Product
Dave Dickey	June 12, 2006	Kathy Sweeney, Fred Shepard, Jamie Miller	E-mail correspondence regarding analysis of accounts receivable information for project.	Work Product
Dave Dickey	June 13, 2006	Laurie Tomasovsky, Dwight Specht, Jay Omdahl	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Jay Omdahl	June 13,	Victor Pepi	E-mail	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
	2006		correspondence regarding project planning as part of investigation in anticipation of litigation.	
Victor Pepi	June 14, 2006	Jay Omdahl	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Jay Omdahl	June 14, 2006	Victor Pepi	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	June 20, 2006	Fred Shepard, Jamie Miller, Kathy Sweeney	E-mail correspondence regarding accounts receivables as part of investigation in anticipation of litigation.	Work Product
Fred Shepard	June 20, 2006	Dave Dickey, Jamie Miller, Kathy Sweeney	E-mail correspondence regarding accounts receivables as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	June 20, 2006	Fred Shepard, Jamie Miller, Kathy Sweeney	E-mail correspondence regarding accounts receivables as part of investigation in	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			anticipation of	
			litigation.	
Kimberly Tan	June 23, 2006	Greg Kerns	E-mail correspondence regarding accounts receivables as	Work Product
			part of investigation in anticipation of litigation.	
Greg Kerns	June 23, 2006	Kimberly Tan, Jay Omdahl	E-mail correspondence regarding project planning as part of investigation in anticipation.	Work Product
Laura A. Pfohl (Stevenson)	June 30, 2006	Jamie Miller, Fred Shepard, Lori Glass	E-mail correspondence with issues that need immediate attention next week.	Work Product
Kathy Sweeney	July 11, 2006	Dave Dickey, Lauri Tomasovsky, Fred Shepard	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	July 11, 2006	Kathy Sweeney, Laurie Tomasovsky, Fred Shepard	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Laurie Tomasovsky	July 11, 2006	Dave Dickey, Kathy Sweeney, Fred Shepard	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
Kathy Sweeney	July 11, 2006	Laurie Tomasovsky, Dave Dickey, Fred Shepard	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Laurie Tomasovsky	July 11, 2006	Kathy Sweeney, Dave Dickey, Fred Shepard	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Jamie Miller	July 12, 2006	Dave Dickey	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	July 12, 2006	Jamie Miller	E-mail correspondence regarding project planning as part of investigation in anticipation of litigation.	Work Product
Keil Merrick	August 2, 2006	Dave Dickey	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	August 2, 2006	Keil Merrick	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Elie Saliba	August 15, 2006	Maria Urdinarrain	E-mail correspondence regarding project	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			status as part of investigation in anticipation of litigation.	
Maria Urdinarrain	August 15, 2006	Elie Saliba, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Elie Saliba	August 15, 2006	Maria Urdinarrain, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Maria Urdinarrain	August 15, 2006	Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Maria Urdinarrain	August 15, 2006	Jay Omdahl	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Jay Omdahl	August 15, 2006	Maria Urdinarrain, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	August 15, 2006	Jay Omdahl, Maria Urdinarrain	E-mail correspondence regarding project status as part of investigation in anticipation of	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			litigation.	
Jay Omdahl	August 27, 2006	Dave Dickey, Dwight Specht	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	August 27, 2006	Jay Omdahl, Dwight Specht	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Jay Omdahl	August 27, 2006	Dave Dickey, Dwight Specht	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Jay Omdahl	August 27, 2006	Maria Urdinarrain, Victor Pepi	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Victor Pepi	August 27, 2006	Jay Omdahl, Maria Urdinarrain	E-mail correspondence regarding regarding project status as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	August 15, 2006	Maria Urdinarrain, Jay Omdahl, Dwight Specht	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Maria	August 15,	Victor Pepi	E-mail	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
Urdinarrain	2006		correspondence regarding project status as part of investigation in anticipation of litigation.	
Maria Urdinarrain	August 28, 2006	Victor Pepi, Jay Omdahl	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Victor Pepi	August 29, 2006	Maria Urdinarrain, Jay Omdahl, Dave Dickey, Laurie Tomasovsky	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
		Maria Urdinarrain, Victor Pepi	Memorandum attachment regarding project status as part of investigation in anticipation of litigation.	Work Product
Crystal Wilmot	September 6, 2006	Dave Dickey	E-mail correspondence regarding Master Service Agreement and Master Service Order-GMA 02.	Work Product
Brett Christiansen	September 6, 2006	Dave Dickey	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product; Attorney Client Communication
Dave Dickey	September 6, 2006	Jeff Margolies, Jamie Miller, Howard Diamond	E-mail correspondence advising receipt of GMA	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			termination letter	
			with ePartners in	
			anticipation of	
3.744-774			litigation.	
Dave Dickey	September 6,	Brett	E-mail	Work Product;
	2006	Christiansen	correspondence	Attorney Client
			regarding GMA	Communication
			termination letter.	
Dave Dickey	September 6,	Dwight Specht,	E-mail	Work Product
	2006	Laurie	correspondence	
		Tomasovsky	regarding project	
			status as part of	
			investigation in	
			anticipation of	
			litigation.	
Dave Dickey	September 6,	Victor Pepi,	E-mail	Work Product
	2006	Maria	correspondence	
		Urdinarrain	regarding project	
			status as part of	
			investigation in	
			anticipation of	
*			litigation.	xxx 1 25 1
Laurie	September 6,	Maria	E-mail	Work Product
Tomasovsky	2006	Urdinarrain,	correspondence	
		Mark	regarding project	
		Vinicombe,	status as part of	
		Dave Dickey	investigation in	
			anticipation of	
Jamie Miller	0 1 1	D. D. 1	litigation.	Work Product
Jamie Miller	September 6,	Dave Dickey	E-mail	work Product
	2006		correspondence	
			regarding project	
			status as part of	
			investigation in	
			anticipation of litigation.	
Stacey Starrett	Contombou 7	Various	E-mail	Work Product;
on behalf of	September 7, 2006	ePartners	correspondence	Attorney Client
Brett	2000	employees	regarding formal	Communication
Christiansen		cmproyees	notice of dispute.	Communication
Stacey Starrett	September 7,	Various	E-mail	Work Product;
on behalf of	2006	ePartners	correspondence	Attorney Client
Brett	2000	employees	regarding formal	Communication
Christiansen		omproyous	notice of dispute.	Communication
Various	September 7,	Brett	E-mail	Work Product;

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
ePartners	2006	Christiansen	correspondence	Attorney Client
employees			regarding formal	Communication
			notice of dispute.	AW According
Dave Dickey	September	Brett	E-mail	Work Product;
	12, 2006	Christiansen	correspondence	Attorney Client
			regarding project	Communication
			status as part of	
			investigation in	
			anticipation of	
Jamie Miller	G41	D1 (T	litigation. E-mail	Work Product
Jaime Miller	September	Daryl Traeger,		WORK Product
	22, 2006	Fred Shepard, Kathy Sweeney	correspondence regarding account	
		Ramy Sweeney	receivables for	
			project as part of	
			internal	
			investigation in	
			anticipation of	
			litigation.	
Fred Shepard	September	Jamie Miller,	E-mail	Work Product
-	22, 2006	Daryl Traeger,	correspondence	
		Kathy Sweeney	regarding project	
			status as part of	
			investigation in	
			anticipation of	
			litigation.	
Kathy Sweeney	September	Jamie Miller,	E-mail	Work Product
	22, 2006	Daryl Traeger,	correspondence	
		Fred Shepard	regarding project	
			status as part of investigation in	
İ			anticipation of	
			litigation.	
Jamie Miller	September	Kathy Sweeney,	E-mail	Work Product
	22, 2006	Daryl Traeger,	correspondence	
	,	Fred Shepard	regarding project	
		¥	status as part of	
			investigation in	
			anticipation of	
			litigation.	
Kathy Sweeney	September	Jamie Miller,	E-mail	Work Product
	22, 2006	Daryl Traeger,	correspondence	
		Fred Shepard	regarding project	
			status as part of	
			investigation in	· · · · · · · · · · · · · · · · · · ·

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
			anticipation of litigation.	
Dave Dickey	October 3, 2006	Dave Dickey, Jeff Margolies, Jamie Miller	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Jeff Margolies on behalf of Dave Dickey	October 4, 2006	Dave Dickey	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	October 4, 2006	Jeff Margoilies	E-mail correspondence regarding project status as part of internal investigation in anticipation of litigation.	Work Product
Kathy Sweeney	October 16, 2006	Darrell Cheek	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Kathy Sweeney	October 16, 2006	Fred Shepard	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Fred Shepard	October 16, 2006	Kathy Sweeney	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
Kathy Sweeney	October 16, 2006	Fred Shepard	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Fred Shepard	October 16, 2006	Kathy Sweeney	E-mail correspondence regarding project status as part of investigation in anticipation.	Work Product
Kathy Sweeney	October 16, 2006	Fred Shepard	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Darrell Cheek	October 17, 2006	Kathy Sweeney	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Barbara Anderson	June 20, 2005	Darrell Cheek, Becky Carspecken (Coyne)	E-mail correspondence regarding project status as part of investigation in anticipation of litigation.	Work Product
Brett Christiansen	November 27, 2006	Various ePartners employees	E-mail correspondence regarding formal notice of dispute.	Work Product; Attorney Client Communication
Brett Christiansen	November 28, 2006	Dave Dickey	E-mail correspondence regarding designation of "point person" for continued	Work Product; Attorney Client Communication

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			investigation in anticipation of litigation.	
Dave Dickey	November 29, 2006	Brett Christiansen	E-mail correspondence regarding designation of "point person" for continued investigation in anticipation.	Work Product; Attorney Client Communication
Brett Christiansen	December 8, 2006	Dave Dickey	E-mail correspondence regarding designation of "point person" for continued investigation in anticipation of litigation.	Work Product; Attorney Client Communication
Stacey Starrett	January 12, 2007	Various ePartners employees	E-mail correspondence regarding collection of project related documents.	Work Product; Attorney Client Communication
Stacey Starrett	January 20, 2007	Various ePartners employees	E-mail correspondence regarding formal notice of dispute.	Work Product; Attorney Client Communication
Dave Dickey	August 10, 2006	Laurie Tomasovsky, Dwight Specht	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Maria Urdinarrain	July 6, 2006	Bernard Khoury, Laurie Tomasovsky, Dave Dickey, Victor Pepi	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product

Author	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
Dave Dickey	July 6, 2006	Laurie Tomasovsky, Dwight Specht	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	June 11, 2006	Laurie Tomasovsky, Dwight Specht	E-mail correspondence transmitting Draft Settlement Agreement.	Work Product
Dave Dickey	June 1, 2006	Laurie Tomasovsky	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Mario Hebert	April 27, 2006	Laurie Tomasovsky, Dave Dickey, David Briggs	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Dave Dickey	April 27, 2006	Mario Hebert, Laurie Tomasovsky, David Briggs	E-mail correspondence regarding status of project as part of investigation in anticipation of litigation.	Work Product
Becky Carspecken (Coyne)	January 22, 2007	Becky Carspecken (Coyne)	E-mail correspondence forwarding documents.	Work Product
			Service Order No. GMAUK-0001. Service Order No.	Work Product Work Product
			GMAUK00-02. Product Order with Terms and Conditions between ePartners	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	PRIVILEGE
			(UK) Limited and	
			Capelli of New	
			York.	
			Service Order No.	Work Product
			UK001.	
			Change Order	Work Product
			No. C-GMAUK-	
			0001-1.	
Becky	January 16,	Stacey Starrett	E-mail	Work Product
Carspecken	2007		correspondence	
(Coyne)			regarding UK documents	
			needed in	
			anticipation of	
			litigation.	
Stacey Starrett	January 18,	Becky	E-mail	Work Product;
Starton	2007	Carspecken	correspondence	Attorney Client
		(Coyne)	regarding	Communication
		())	compiling all	
			documents related	
			to Capelli in	
			anticipation of	
			litigation.	
Becky	January 22,	Stacey Starrett	E-mail	Work Product
Carspecken	2007		correspondence	
(Coyne)			forwarding	
			contracts from the	
			UK in anticipation of	
			litigation,	
			including Service	
			Order No.	
			GMAUK-0001,	
			Service Order	
			GMAUK00-02,	
			Product Order	
			between ePartners	
			and Capelli of	
			New York,	
			Service Order No.	
			UK001, and	
			Change Order	
			No. C-GMAUK-	
Moule	Tamuami 22	Stagori Stagott	0001-1.	Warls Draduct
Mark	January 23,	Stacey Starrett	E-mail	Work Product

AUTHOR	DATE	RECIPIENTS	DESCRIPTION	Privilege
Vinicombe	2007		correspondence	
			regarding	
i			documents copied	
			in anticipation of	
			litigation.	
Stacey Starrett	February 2,	Darrell Cheek,	E-mail	Work Product;
	2007	Fred Shepard,	correspondence	Attorney Client
		Erik Sevenants,	regarding	Communication
		Jay Omdahl,	collection of	
		Lisa Palmer	information as	
			part of	
			investigation in	
			anticipation of	
			litigation.	

Dated: New York, New York March 31, 2008

Respectfully submitted,

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(214) 749-6000

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Attorneys for Defendant ePartners, Incorporated